

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION  
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In re :

Case Number **6:15-04479-KSJ**

Chapter 7

**Jeff Brannon**  
**Briggett Brannon**

Debtor(s).

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**APPLICATION & DECLARATION FOR ORDER**  
**AUTHORIZING EMPLOYMENT OF SPECIAL LEGAL COUNSEL**

**APPLICATION**

The duly appointed trustee in this Chapter 7 case, Marie E. Henkel, applies for an Order approving the employment of Kristen L. Henkel, Esq., and the law firm of M. E. Henkel, P.A., 3560 S. Magnolia, Orlando, FL 32806, to represent and assist the trustee in selling a parcel of real estate, an asset of this estate. Applicant will order the title search, examine title, issue title insurance and prepare closing documents for the sale of residential real estate located in Lake County, Florida, more particularly described as follows :

**Unit 14D, MISSION CORONADO, a Condominium, according to the Declaration of Condominium, recorded in Official Records Book 3385, Pages 1468 through 1577, inclusive, of the Public Records of Lake County, Florida, as may be amended, together with all tenements, hereditaments and appurtenances thereto belonging or in anywise appertaining.**

**a/k/a 9322 Avenida San Pablo, Unit 14D, Howey In The Hills, FL 34737**  
**Parcel ID # 22-20-25-1300000014D0**

Applicant is a licensed attorney and is familiar and knowledgeable in the preparation of documents necessary for real property sales. The trustee believes that applicant has the ability and experience to render the necessary assistance. Further, applicant has agreed to perform the required services for a fee of \$400.00, plus the agent's share of underwriting premium for the owner's title insurance, which title insurance shall be issued at the minimum promulgated rate, as set by the Commissioner of Insurance for the State of Florida, subject to the provisions of § 330 of the Bankruptcy Code. The terms of the contract for the pending sale of the real estate requires the seller to bear the customary and ordinary costs of closing, normally borne by a seller, including applicant's fees described above.

Special Legal Counsel has agreed to seek compensation for legal services rendered in the Bankruptcy Court to obtain court approval of the sale at said counsel's standard hourly rate of \$250.00, per hour, pursuant to the provisions of § 330 of the Bankruptcy Code.

To the best of the trustee's knowledge, the attorney has no connection with the debtor, creditors, any other party in interest, their respective attorneys and Accountants, the United States Trustee or any person employed in the office of the United States Trustee except as disclosed in the following declaration.

Trustee therefore requests that the Court enter an Order approving the employment of special counsel for the purposes described above.

Dated October 14, 2015.

*/s/ Marie E. Henkel*  
Marie E. Henkel, Trustee  
Florida Bar No. 260320  
M. E. Henkel, P.A.  
3560 S. Magnolia Ave.  
Orlando, Florida 32806  
Telephone : (407) 438-6738  
Facsimile : (407) 585-9466

**DECLARATION OF PROPOSED SPECIAL COUNSEL**

I, Kristen L. Henkel, declare under penalty of perjury pursuant to the provisions of 28 U.S.C. § 1746 that the following statements are true and correct :

1. I am an attorney admitted to practice in the United States District Court for the Middle District of Florida.
2. I am a member of the law firm of M. E. Henkel, P.A.
3. Neither I, nor any member of my firm, have any connection with the debtors, creditors, or any other party in interest, their respective attorneys and Accountants, the United States Trustee, or any other person employed in the office of the United States Trustee except that: a member of my firm is a member of the panel of Chapter 7 Trustees in this district and is the trustee assigned to this case; however, that relationship is complementary to the duties I will perform as special counsel and presents no conflict of interest detrimental to the estate or unsecured creditors.
4. Based on the foregoing, Kristen L. Henkel believes that she and the firm, M. E. Henkel, P.A., is a "disinterested person" within the meaning of § 101(14) of the Bankruptcy Code.
5. Kristen L. Henkel, nor any member of M. E. Henkel, P.A. will, while employed by the Trustee, represent in connection with this case, any other entity that has an adverse interest.
6. Therefore, Kristen L. Henkel knows of no reason why said attorney and law firm should not be retained as Attorney for Trustee.
7. I understand that any fees to be by the estate must be approved as reasonable by the Bankruptcy Court, pursuant to 11 U.S.C. § 330, and that my closing fee of \$400.00 and title agent's share of the

title insurance premium, if paid at closing, is subject to disgorgement pursuant to a future Order of this Court; and further that any legal services I perform in the Bankruptcy Court to obtain approval of said sale, will be billed at the rate of \$250.00 per hour, and that said attorney's fee will be paid only after a Court Order is entered authorizing and approving said fee.

Dated this October 14, 2015.

*/s/ Kristen L. Henkel*  
Kristen L. Henkel, Esq.  
Florida Bar No. 81858  
M. E. Henkel, P.A.  
3560 South Magnolia Avenue  
Orlando, Florida 32806  
Telephone : (407) 438-6738  
Facsimile : (407) 858-9466  
khenkel@mehenkel.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was provided by United States Mail, postage prepaid, or by electronic delivery to : United States Trustee, 400 W. Washington St., Suite 1100, Orlando, Florida 32801; Jeff Brannon and Briggett Brannon, 17418 Villa City Rd., Groveland, FL 34736, *Debtor(s)*; Joel L Gross, 655 W. Hwy 50, Ste 101, Clermont, FL 34713, *Debtor(s)' Attorney*, on October 14, 2015.

*/s/ Kristen L. Henkel*  
Kristen L. Henkel, Esq.